

Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

UNITED STATES DISTRICT COURT

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for the

Baltimore District of MarylandCivil Division

JUN 17 2021

AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

DEPUTY

BY

Case No. ELH-21-1504

(to be filled in by the Clerk's Office)

Kaleb Kango El

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Walker Mew Apts, et al.

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT AND REQUEST FOR INJUNCTION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Kaleb Kango El</u>
Street Address	<u>6225 York Rd # N418</u>
City and County	<u>Baltimore</u>
State and Zip Code	<u>MD 21212</u>
Telephone Number	<u>443-449-0515</u>
E-mail Address	<u>Wlgktsy@gmail.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

Defendant No. 1

Name

Walker Mews Apartments

Job or Title (if known)

Street Address

6225 York Rd

City and County

Baltimore

State and Zip Code

MD 21212

Telephone Number

410-323-8507

E-mail Address (if known)

Defendant No. 2

Name

Law Offices of Markey and Orsi

Job or Title (if known)

Street Address

1426 E. Joppa Rd

City and County

Towson

State and Zip Code

MD 21286-3004

Telephone Number

410-583-0755

E-mail Address (if known)

info@markeyorsiaw.com

Defendant No. 3

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

Defendant No. 4

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

18 USC 241, 18 USC 242, Full Faith and Credit Clause, Contract Clause, Reserved Powers Clause, Due Process Clause, Equal Protection Clause

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) _____, is a citizen of the State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____ and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

- b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

Baltimore, MD

- B. What date and approximate time did the events giving rise to your claim(s) occur?

June 4, 2021 12:00 pm

C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

On June 4, 2021, a Grievance Letter, pertaining to a Notice to Quit issued by Walker Mews Apts to Johnny Mason, a tenant at Walker Mews Apts, was hand delivered to Shelia Bigging, manager of Walker Mews Apts, and mailed to Brook Hailu, attorney for Markey and Orsi. A copy is attached hereto as Exhibit A thru Exhibit E. On June 8, Walker Mews Apts issued Johnny Mason a letter rebutting the notice. A copy is attached hereto as Exhibit F. The same day, Johnny Mason sent the Defendants a conditional acceptance requesting proof of claim under penalty of perjury. A copy is attached as Exhibit G. Defendants have failed to provide proof of claim nor has the Defendants honored the Grievance Letter.

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

Defendants have willfully failed and refused to honor the Grievance Letter or any other notice affecting the rights of the Plaintiff. Unless an injunction is issued, Plaintiff's interests will continue to be deprived including eviction proceedings possibly initiated against Johnny Mason.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff is seeking \$950 trillion dollars in compensatory damages, \$950 trillion dollars in punitive damages, and a permanent injunction against Walker Mew Apts, requesting they refrain from any action depriving the interest of the Plaintiff based on violations of the U.S Constitution and Federal Law.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 6/14/21

Signature of Plaintiff

Printed Name of Plaintiff

Kaleb K. Ampu E1

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address